

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

DUSA
7/21/18
UNITED STATES OF AMERICA

v.

ELECTRONIC CRIMINAL COMPLAINT
(Redacted)

RICHARD SHEPHERD

CASE NUMBER: 18-04230MJ-PCT-DMF

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

COUNT 1

On or about July 14, 2018, in the District of Arizona, within the confines of the Navajo Indian Reservation, Indian Country, the defendant, **RICHARD SHEPHERD**, an adult Indian male, did knowingly cause the death of L.Y. in violation of Title 18, United States Code, Sections 1111 and 1153.

I further state that I am a sworn law enforcement officer with the Federal Bureau of Investigation, and that this Complaint is based on the following facts: **See attached Affidavit incorporated herein.**

Continued on an attachment sheet and made a part hereof: ☒ Yes ☐ No

 X Pursuant to 28 U.S.C. § 1746(2), I declare
that the foregoing is true and correct.

REVIEWED BY: /s/ AUSA Camille D. Bibles

Joshua B. Arndt, Special Agent, FBI
Complainant's Name and Title

J.B. Arndt 07/21/2018
Complainant's Signature Date

July 21, 2018, at 4:27 p.m.
Date/Time

Flagstaff, Arizona
City and State

 X Sworn by Telephone

DEBORAH M. FINE, U.S. Magistrate Judge
Name & Title of Judicial Office

Deborah M Fine
Signature of Judicial Officer

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

REDACTED AFFIDAVIT

The undersigned, being duly sworn, deposes and states as follows:

1. Your affiant, Joshua B. Arndt, is a Special Agent (SA) of the Federal Bureau of Investigation (FBI), and is currently assigned to the Flagstaff, Arizona Resident Agency of the Phoenix, Arizona FBI Division. In the course of his official duties, your affiant is charged with the investigation of crimes occurring on the Navajo Nation Indian Reservation within the District of Arizona.

2. The information contained in this affidavit is based on your affiant's investigation and knowledge, as well as information derived from reports and interviews of law enforcement officers and/or witnesses named herein. Because this affidavit is made for the limited purpose of establishing probable cause, your affiant has not listed every fact known concerning this investigation.

3. This case involves the investigation of the death of REDACTED (hereinafter known as LY) on the Navajo Indian Reservation caused by Richard Kingston Shepherd (hereinafter known as Sheperd), a twenty-year (20) year old Navajo male. The incident occurred on or about July 14, 2018 in Tuba City, Arizona, which is within the confines of the Navajo Indian Reservation (Indian Country) in the District of Arizona. The Navajo Indian Tribe is a federally recognized Indian tribe.

4. On July 20, 2018, the Navajo Department of Public Safety and the FBI were notified of a deceased individual found near the football field bleachers at Tuba City High

School in Tuba City, Arizona. A search was conducted of the area. The deceased individual appeared to be nude, was decomposing, and had a tattoo on her back shoulder with the name "REDACTED." Multiple discolorations were found on the bleachers, some with shoe prints in them. Additionally, an EBT card was found near LY's body with Shepherd's name on it.

5. On July 20, 2018, LB's aunt, REDACTED (hereinafter referred to as PM), was interviewed and provided the following information: the last time PM had seen LY had been Saturday night when she was leaving with a male named "Kingston."

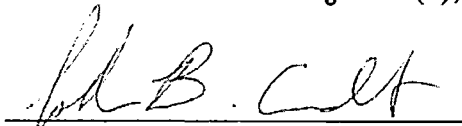
6. On July 20, 2018, Shepherd was interviewed and provided the following information: Shepherd goes by the name "Kingston." After LY and Shepherd left Shepherd's residence, they went for a walk and ended up near Tuba City High School. LY and Shepherd decided to have sex and took off their clothes. Shepherd changed his mind because he had a girlfriend. LY got mad at Shepherd and slapped him. Shepherd got upset and pushed LY, causing her to fall back and hit her head on a sharp pole on the bleachers. LY was crawling away and Shepherd kicked LY between six (6) and eight (8) times. LY was screaming "stop" after Shepherd had drug LY down the stairs. Shepherd was asked if he put LY down below so that no one would see and he indicated yes. Shepherd initially agreed that he drug LY down the stairs but later indicated that he picked LY up and finally Shepherd indicated LY had fallen down the stairs. Shepherd indicated LY was not deceased when he put her at the bottom of the stairs. Shepherd indicated he was going to go back and check on LY but other things came up. Shepherd saw a lot of blood but didn't know what to do. Shepherd was not sure why he didn't stop after LY hit her head and Shepherd

saw a lot of blood. Shepherd had used drugs and alcohol the day the fight occurred. Shepherd indicated that if he had a phone or LY had a phone he would've done something. During the interview with Shepherd, your affiant observed Shepherd wearing shoes with a similar pattern on the bottom as bloody shoe prints found at the scene.

7. On July 20, 2018, while Shepherd was being transported to Flagstaff after his arrest, Shepherd asked your affiant if he could use your affiant's phone to call his grandmother. During the phone call to his grandmother, Shepherd told his grandmother that he beat a girl to death.

8. Based on the foregoing, your affiant believes that on or about July 14, 2018, in the District of Arizona, within the confines of the Navajo Indian Reservation, Richard Kingston Shepherd, an adult Indian male, did commit Second Degree Murder, in violation of Title 18, United States Code, Sections 1111 and 1153.


Pursuant to 28 U.S.C. § 1746(2), I declare that the foregoing is true and correct.


Joshua B. Arndt
Special Agent, FBI

07/21/2018
Date

X Sworn by Telephone

Date/Time: July 21, 2017, at 4:27 p.m.


Deborah M. Fine
United States Magistrate Judge